REMARKS

Status Summary

Claims 1-7 and 11-23 are pending in the present application. In this amendment, no claims have been canceled, and no new claims have been added. Therefore, upon entry of this amendment, claims 1-7 and 11-23 remain pending.

Claim Rejection - 35 U.S.C. § 103

Claims 1-2, 5-7, 15-17 and 20-21 are rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Application Publication No. 2005/0058061 to Shaffer et al. (hereinafter, "Shaffer") in view of U.S. Patent No. 7,286,545 to Tester et al. (hereinafter, "Tester"), U.S. Patent Application Publication No. 2004/0063499 to Schneider et al. (hereinafter, "Schneider"), U.S. Patent No. 6,640,251 to Wiget (hereinafter, "Wiget") and U.S. Patent No. 6,308,282 to Huang et al. (hereinafter, "Huang"). This rejection is respectfully traversed.

Independent claim 1 recites a multi-site redundant telephony call processing system that comprises an active telephony call processing host located in a first geographic region for controlling calls between telephony subscribers and a standby telephony call processing host located in a second geographic region remote from the first geographic region for taking over call control functions handled by the active telephony call processing host in response to failure of the active telephony call processing host, the active and standby call processing hosts forming a single logical telephony call processing node. The system of claim 1 also includes a first local area network (LAN) including a first LAN segment and a second LAN segment being

geographically distributed between the first and second geographic regions for carrying signaling messages to and from the active and standby telephony call processing hosts, wherein the first LAN is bridged over a wide area network (WAN) by interconnecting the first LAN segment located in the first geographic region with the second LAN segment located in the second geographic region. The system further includes a second LAN including a first LAN segment located in the second geographic region and a second segment located in the first geographic region, wherein the second LAN is a redundant LAN with respect to the first LAN, and wherein each of the first LAN and the second LAN respectively includes a single IP subnet. The active telephony call processing host is connected to both the first segment of the first LAN in the first geographic region and the first segment of the second LAN in the first geographic region and that the standby telephony call processing host is connected to both the second segment of the first LAN in the second geographic region and the second segment of the second LAN in the second geographic region. Therefore, claim 1 recites that an active call processing host and a standby call processing host are each connected to segments of a first LAN and second LAN.

Applicants submit that there is no teaching, disclosure, or suggestion in the combination of Shaffer, Tester, Schneider, Wiget, and Huang of an active call processing host and a standby call processing host that are each connected to segments of a first LAN and second LAN. However, page 3, item 5 of the Official Action states that Shaffer in view of Tester, Schneider, and Widget do not disclose the call processing hosts connected to the first LAN and second LAN. Applicants agree. The

Official Action further states that Huang discloses a device connected to LANs. Applicants disagree and submit that Huang is instead directed to implementation of fault-tolerant networks that include nodes **120** connected to Ethernet busses **110**. (See Figure 1A of Huang.) Nodes are connected to Ethernet busses via network switches **240**. (See Figure 1B of Huang.) Applicants submit that the busses **110** are alternate channels used to traverse the single LAN. A channel is defined as a path from a network interface card on a node to a drop to a switch, and from the switch to another drop to another network interface card on another node. (See Column 8, lines 12-20, as well as Figure 1A, of Huang.)

It is respectfully submitted that the busses and channels disclosed in Huang are not the same as a first LAN and second LAN (i.e. separate LANs) as recited in claim 1. A single LAN may comprise devices interconnected by many busses and channels. Furthermore, Huang never mentions a single device connected to two distinct LAN's, only a single device connected to two busses and/or two channels via busses, which as explained above, are not the same as a first LAN and a second LAN. Therefore, applicants submit that Huang fails to teach, disclose, or suggest an active call processing host and a standby call processing host that are each connected to segments of a first LAN and second LAN.

Furthermore, page 3 of the Official Action states that Schneider discloses geographically distributed servers connected to respective LANs bridged by a WAN. Applicants submit that these servers disclosed in Schneider are not the same as an active and standby call processing host, as recited in claim 1. An active and standby

call processing host implies that there is an active host for actively processing calls and a redundant standby host. As opposed to an active host and redundant standby host, as recited in claim 1, Schneider discloses a single master server **14**, a server **26** for tracking carded EGM play, a player server **27** for providing messages to displays associated with EGM's, and a key distribution center **29** for implementing security. None of these servers disclosed in Schneider are redundant or standby servers, as recited in claim 1. Furthermore, paragraph [0014] of Schneider states that the same components, except for a master server, appear in different LANs. In other words, only one master server appears in the entire network. Furthermore, there is no mention or suggestion that the master server needs to communicate with a second master server located on one or more LANs depicted in Figure 1 of Schneider. Therefore, applicants submit that Schneider fails to teach, disclose, or suggest geographically distributed servers connected to respective LANs bridged by a WAN. Applicants therefore submit that Shaffer in view of Tester and in further view of Schneider in further view of Wiget and in further view of Huang does not teach, disclose, or suggest an active call processing host and a standby call processing host that are each connected to segments of a first LAN and second LAN, as recited in claim 1.

Independent claim 15 recites similar elements as claim 1. Claims 2, 5-7, 16-17 and 20-21 depend from independent claims 1 and 15 and recite additional features. As such and for the exact same reasons set forth above, applicants submit that claims 2, 5-7, 15-17 and 20-21 are not made obvious by Shaffer in view of Tester and in further view of Schneider in further view of Wiget and in further view of Huang. Therefore, it is

submitted that the rejection of claims 1, 2, 5-7, 15-17, 20, and 21 under 35 U.S.C. § 103 should also be withdrawn.

Claims 3, 4, 18, and 19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaffer in view of Tester, Schneider, and Wiget, as applied to claim 1 or 15 above, and further in view of U.S. Patent Application Publication No. 2002/0160810 to Glitho et al. (hereinafter, "Glitho"). This rejection is respectfully traversed.

Claims 3-4 depend from claim 1 and claims 18-19 depend from claim 15. As stated above, the combination of Shaffer, Tester, Schneider, Wiget, and Huang fails to teach or suggest an active call processing host and a standby call processing host that are each connected to segments of a first LAN and second LAN, as recited in claim 1. Glitho likewise lacks such teaching, direction, or suggestion. Glitho is instead directed to an intelligent network service control point and method of implementing user services utilizing call processing language scripts. Thus, Glitho fails to bridge the substantial gap existing between the claimed subject matter and the combination of Shaffer, Tester, Schneider, Wiget, and Huang. Accordingly, it is respectfully submitted that the rejection of claims 3-4 and 18-19 as being unpatentable over the combination of Shaffer, Tester, Schneider, Wiget and Glitho should be withdrawn.

Claims 11-14 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Schaffer in view of Tester, Schneider and Wiget as applied to claim 1 above, and further in view of U.S. Patent No. 6,796,087 to Westfall et al. (hereinafter, "Westfall"). This rejection is respectfully traversed.

Claims 11-14 depend from claim 1. As stated above, the combination of Shaffer, Tester, Schneider, Wiget, and Huang fails to teach or suggest an active call processing host and a standby call processing host that are each connected to segments of a first LAN and second LAN, as recited in claim 1. Westfall likewise lacks such teaching or suggestion. Westfall is instead directed to a method and apparatus for configuring packet data networks to supply services to users. One embodiment automatically deploys services onto a network of routers in order to satisfy the requirements of offered service. Thus, Westfall fails to bridge the substantial gap existing between the claimed subject matter and the combination of Shaffer, Tester, Schneider, Wiget, and Huang. Accordingly, it is respectfully submitted that the rejection of claims 11-14 as being unpatentable over the combination of Shaffer, Tester, Schneider, Wiget, and Westfall should be withdrawn.

Claims 22-23 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaffer in view of Tester, Schneider, Wiget, Westfall and U.S. Patent Application Publication No. 2002/0165972 to Chien et al. (hereinafter, "Chien"). This rejection is respectfully traversed. Page 5 of the Official Action states that Shaffer in view of White, Gordon and Westfall does not disclose using masking to route packets. It is assumed that this sentence is a typo and instead the Official Action should read Shaffer in view of Tester, Schneider, Wiget and Westfall.

Claims 22 and 23 are independent claims which include similar patentable aspects recited in claim 1 that are not taught by Shaffer, Tester, Schneider, Wiget, Westfall, Huang and Chien. Independent claims 22 and 23 recite similar elements to

claim 1, including an active call processing host and a standby call processing host that are each connected to segments of a first LAN and second LAN.

As discussed above, the combination of Shaffer, Tester, Schneider, Wiget, Huang, and Westfall fails to teach or suggest an active call processing host and a standby call processing host that are each connected to segments of a first LAN and second LAN. Chien likewise lacks such teaching or suggestion. Chien is instead directed to a method and apparatus for reducing traffic over a communication link used by a computer network. Thus, Chien fails to bridge the substantial gap existing between the claimed subject matter and the combination of Shaffer, Tester, Schneider, Wiget and Westfall. Accordingly, it is respectfully submitted that the rejection of claims 11-14 as being unpatentable over the combination of Shaffer, Tester, Schneider, Wiget, Westfall and Chien should be withdrawn.

CONCLUSION

In light of the above amendments and remarks, it is respectfully submitted that the present application is now in proper condition for allowance, and an early notice to such effect is earnestly solicited.

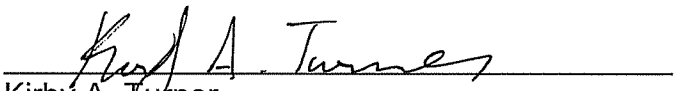
If any small matter should remain outstanding after the Patent Examiner has had an opportunity to review the above Remarks, the Patent Examiner is respectfully requested to telephone the undersigned patent attorney in order to resolve these matters and avoid the issuance of another Official Action.

DEPOSIT ACCOUNT

The Commissioner is hereby authorized to charge any fees associated with the filing of this correspondence to Deposit Account No. **50-0426**.

Respectfully submitted,

JENKINS, WILSON, TAYLOR & HUNT, P.A.

Date: June 21, 2011 By: 

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